

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION

Civil No. 3:22-CV-00093-PDW-ARS

Jessica Allen, individually and on behalf)
of the Heirs at Law of Lacey Higdem,)

Plaintiff,)

v.)

Myles Brunelle, in his individual)
capacity; April Azure, in her individual)
capacity; Rolette County; Roy Cordy,)
MD; and Presentation Medical Center,)

Defendants.

AFFIDAVIT OF NATHAN A. GUSTAFSON

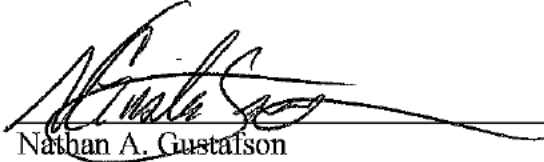
STATE OF NORTH DAKOTA)
) SS.
COUNTY OF ROLETTE)

Being duly sworn, Nathan A. Gustafson, testifies:

1. I have been the Sheriff of Rolette County, North Dakota, since 2019.
2. In approximately late June 2020, during the investigations into the death of Lacey Higdem at the Rolette County Law Enforcement Center ("RCLEC"), I became aware of one or more videos recorded by RCLEC's monitoring system which showed former correctional officers Myles Brunelle and April Azure having inappropriate physical contact with one another inside the premises of RCLEC.
3. I do not remember the exact date(s) or time(s) the video(s) were recorded, but none of the video(s) of Brunelle and Azure having inappropriate physical contact with one another are from the time Higdem was at RCLEC on June 3 and 4, 2020.

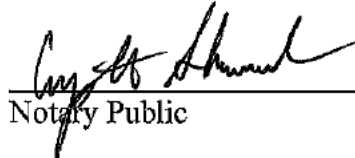
4. The video(s) of Brunelle and Azure having inappropriate physical contact with one another were provided to the North Dakota Bureau of Criminal Investigation and the North Dakota Department of Corrections & Rehabilitation in approximately late June 2020.

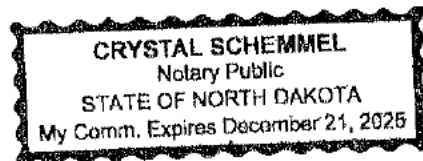
Dated: December ^{17th} 16, 2024.


Nathan A. Gustafson

STATE OF NORTH DAKOTA)
) ss.
COUNTY OF ROLETTE)

On this ^{16th} day of December, 2024, before me personally appeared Nathan A. Gustafson, known to me to be the person described in the within and foregoing instrument, and acknowledged to me that he executed the same.


Notary Public



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **AFFIDAVIT OF NATHAN A. GUSTAFSON** was on the 16th day of December, 2024, was filed electronically with the Clerk of Court through ECF.

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By: /s/ Grant T. Bakke
GRANT T. BAKKE